

## EXHIBIT 155

E0594.1

**From:** Keith Margolis<IMCE:AEX-  
\_O=BELLCO-20DRUG-20CORP+2E\_OU=AMITYVILLE-2C+20NY\_CN=RECIPIENTS\_CN=KMARGOLIS@namprd06.prod.outlook.com>  
**Sent:** Thu, 27 Feb 2014 10:43:42 -0500 (EST)  
**To:** William Price <bprice@bellcohealth.com>; Carol Sherman - Hynes<eschermanhynes@bellcohealth.com>  
**Subject:** FW: Belco - Qualitest SOMS letter and Questionnaire 12/3, 1/20, 2/21  
**Attachments:** Qualitest SOM Letter 10-18-13.pdf; Wholesale Distributor Questionnaire 10-18-12.docx

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Have we submitted this in yet?

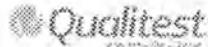
**Keith Margolis**  
Supply Chain Manager  
Bellco Drug Corp., an AmerisourceBergen Co.  
5500 New Horizons Blvd  
N.Amityville, NY 11701  
Phone/Fax: 631-789-6932  
email: [kmargolis@bellcohealth.com](mailto:kmargolis@bellcohealth.com)

**From:** Bayer, Sandra [mailto:[sbayer@qualitestrx.com](mailto:sbayer@qualitestrx.com)]  
**Sent:** Friday, February 21, 2014 4:11 PM  
**To:** Keith Margolis  
**Cc:** Carol Sherman - Hynes; Rhone, Regina - ABSC; Vietri, David - ABSC; McGaha, Bambi; Brantley, Eric; William Price  
**Subject:** RE: Belco - Qualitest SOMS letter and Questionnaire 12/3, 1/20, 2/21

Dear Keith -  
Have you been able to get this Questionnaire completed for Belco? We initially sent out our inquiries in October, 2013 and subsequently every month since then. As stated below, we did receive ABC's documentation, but have yet to receive any information for Belco. It is imperative that Belco responds immediately.

Thank you for your prompt attention to this very importance DEA/SOMS Compliance matter.  
Best regards,

**Sandra Bayer**  
Senior National Sales Executive  
Qualitest, 130 Vintage Drive, Huntsville, AL 35811  
[REDACTED] 973.831.6988 fax  
[sbayer@qualitestrx.com](mailto:sbayer@qualitestrx.com)



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**From:** Bayer, Sandra  
**Sent:** Monday, January 20, 2014 7:44 PM  
**To:** Keith Margolis  
**Cc:** Carol Sherman - Hynes; Rhone, Regina - ABSC; Vietri, David; Franklin Harris ([farris@bellcohealth.com](mailto:farris@bellcohealth.com)); McGaha, Bambi; Brantley, Eric  
**Subject:** Belco - Qualitest SOMS letter and Questionnaire 12/3, 1/20

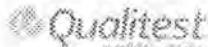
Dear Keith -

We have not yet heard back from Belco (or anyone at ABC corporate on your behalf) regarding the required SOMS Questionnaire. ABC Corporate had filled out their documents in early December, but unfortunately, Belco's information was not included.  
Please send back the completed SOMS Questionnaire as soon as possible to the best of your abilities, so that shipments are not affected. Even if you'd be able to indicate the amount of accounts serviced from your locations, that would be helpful to set some initial parameters.

Also, please don't hesitate to reach out to me or Eric Brantley, Manager, Customer Due Diligence (SOMS and DEA Compliance) at 256-799-7848 if you have any questions what so ever.

Thank you,

**Sandra Bayer**  
Senior National Sales Executive  
Qualitest, 130 Vintage Drive, Huntsville, AL 35811  
[REDACTED] 973.831.6988 fax  
[sbayer@qualitestrx.com](mailto:sbayer@qualitestrx.com)



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Witness:	Par-Norton
Exhibit:	5
Date:	1/16/19
Margaret Reihl, CCR, CRR, RPR	

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**From:** Keith Margolis [mailto:[kmargolis@bellcohealth.com](mailto:kmargolis@bellcohealth.com)]  
**Sent:** Tuesday, December 03, 2013 9:49 AM  
**To:** Bayer, Sandra  
**Cc:** Carol Sherman - Hynes; Rhone, Regina - ABSC; [RTremonte@amerisourcebergen.com](mailto:RTremonte@amerisourcebergen.com); William Price  
**Subject:** EXTERNAL: RE: Bellico - Qualitest SOMS letter and Questionnaire

Sandra,

Our Regulatory and Compliance Manager has sent this off to Corporate when you initially sent this to us. We will follow up with Corporate to see where we are with this.

**Keith Margolis**

Supply Chain Manager  
Bellco Drug Corp., an AmerisourceBergen Co.  
5500 New Horizons Blvd  
N.Amityville, NY 11701  
Phone/Fax: 631-789-6932  
email: [kmargolis@bellcohealth.com](mailto:kmargolis@bellcohealth.com)

**From:** Bayer, Sandra [mailto:[sbayer@qualitestrx.com](mailto:sbayer@qualitestrx.com)]  
**Sent:** Monday, December 02, 2013 6:23 PM  
**To:** Keith Margolis  
**Cc:** Carol Sherman - Hynes; Rhone, Regina - ABSC; [RTremonte@amerisourcebergen.com](mailto:RTremonte@amerisourcebergen.com); William Price; Bayer, Sandra  
**Subject:** Bellco - Qualitest SOMS letter and Questionnaire

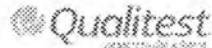
Dear Keith –

I need your help, please. Qualitest sent the attached documents at the end of October and again in November, explaining our development of a DEA Compliance Dept. and our SOMS program to Carol Sherman-Hynes and Bill Price. To date, I don't believe we've received back the completed questionnaire.

We really need the information completed ASAP, so there are no interruptions to orders that are placed. Can you please check with Carol and Bill on this? Thanks in advance for your help and please let me know if you need anything else.

Best regards,

**Sandra Bayer**  
Senior National Sales Executive  
Qualitest, 130 Vintage Drive, Huntsville, AL 35811  
[REDACTED] 973.831.6988 fax  
[sbayer@qualitestrx.com](mailto:sbayer@qualitestrx.com)



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E0594.3 Qualitest  
130 Vintage Drive  
Huntsville, AL 35811  
256.859.4011



qualitestrx.com

October 18<sup>th</sup>, 2013

Dear Valued Customer:

As you may be aware, a large percentage of Qualitest products are categorized as controlled substances or listed chemicals that are regulated by the Drug Enforcement Administration (DEA). These products, while necessary for patients, can be targets for abuse and diversion. As a result, certain Qualitest products have become highly desirable to those seeking to abuse or divert for profit.

When our products leave the legitimate channels they have been manufactured to support, heart-wrenching consequences often occur. As responsible corporate citizens -- individuals, parents, friends, caregivers, relatives and acquaintances -- we need to do as much as we can to prevent drug abuse and diversion in our communities. Each company and individual in the supply chain has that responsibility: to put adequate controls in place to discourage and prevent the diversion of prescription products for uses other than those for which they were originally intended.

As a result of this changing environment and the increased regulatory expectations associated with it, Qualitest would like to make you aware of some changes we are making that may impact you when placing orders with us in the future. Qualitest is enhancing its due diligence efforts when fulfilling orders to provide greater assurance that our products are purchased by appropriate patients for prescribed uses. As a result of this enhanced process, you may receive more frequent inquiries from Qualitest regarding your own suspicious order monitoring efforts, the quantity of product you are ordering from us or the customers you service. If we are not able to verify through inquiries and research that our products are being used for legitimate purposes, we may request an additional step of an on-site visit of either your company or your customer(s). As you may be aware, these due diligence visits have now become a necessary part of an effective suspicious order monitoring program. In addition, the current regulatory environment requires us to monitor, and potentially limit, the amount of product we supply to our customers. With this in mind, orders may be held for review or even not shipped when the applicable order is of unusual size, frequency or deviates from the customer's normal pattern.

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130 Vintage Drive  
Huntsville, AL 358  
256.859.4011



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Of course there are legitimate reasons customers may need additional product, and all factors will be taken into consideration when reviewing orders. You can assist us by providing as much information as rapidly possible, both at the time of your initial order and later in the event we are reviewing a held order.

Suspicious order inquiries will typically be made by members of our DEA Compliance Department, whose contact information is noted below for your reference. If you should have any questions about these changes, please do not hesitate to contact those noted below, your Qualitest Sales Team Representative or the Qualitest Customer Service Department.

We thank you in advance for partnering with us in our efforts to prevent abuse and diversion. We look forward to working with you in this important effort.

Thank you,

Tracey Hernandez, Director DEA Compliance

CC: Charles (Trey) V. Propst, VP National Accounts

Mike Reiney, VP Sales Management

DEA Compliance Department Contacts:

Tracey Hernandez, Director DEA Compliance – 256-799-7178

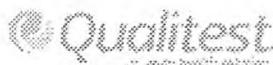
Eric Brantley, Manager SOMS – 256-799-7848

Aimee Cooper, Analyst SOMS – 256-799-7120

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Qualitest  
100 Village Dr.,  
Montgomery, AL 36136  
(866) 279-4333

www.qualitest.com



		Title: <b>WHOLESALE DISTRIBUTOR/ CHAIN DISTRIBUTION CENTER QUESTIONNAIRE</b>		
Form No.:		Version:	Effective:	
Department:				

#### **I. WHOLESALER/CHAIN CORPORATE HEADQUARTERS**

1. Wholesaler Name: \_\_\_\_\_
2. DBA (if any): \_\_\_\_\_
3. Wholesaler Address: \_\_\_\_\_
4. Wholesaler Phone Number: \_\_\_\_\_ Fax Number: \_\_\_\_\_
5. Wholesaler Email Address: \_\_\_\_\_
6. Name of Principle owner(s) \_\_\_\_\_
7. Ownership type (check one)

Sole proprietor     Corporation     Other

8. Owner(s) Name: \_\_\_\_\_ \* If Corporation provide list of Officers
9. Owner Business Address: \_\_\_\_\_
10. Owner Phone Number: \_\_\_\_\_ Fax Number: \_\_\_\_\_
11. Owner Email Address: \_\_\_\_\_
12. Has owner/officers ever had a DEA registration suspended or revoked? Yes \_\_\_\_ No \_\_\_\_

a. If yes, provide details (attach documentation)

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13. Has the owner/officers ever been convicted of a crime relating to distribution of prescription drugs, listed chemicals, or any other crime? Yes \_\_\_\_ No \_\_\_\_

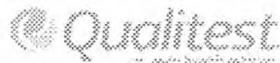
a. If yes, provide details \_\_\_\_\_ (please attach documentation)

#### **II. WHOLESALER/CHAIN DEA REGISTERED DISTRIBUTION CENTER**

14. Wholesaler Name: \_\_\_\_\_
15. Facility Address: \_\_\_\_\_
16. Facility Phone \_\_\_\_\_

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Qualitest  
A leading health solutions company  
1000 University Drive  
Minneapolis, MN 55437  
(612) 870-4422



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17. DEA Registration # of Facility \_\_\_\_\_ (please attach copy).  
 18. State License # for Facility \_\_\_\_\_ (please attach copy).  
 19. State Controlled Substance license #. \_\_\_\_\_ (please attach copy).

### **III. PRIOR HISTORY OF DISTRIBUTION CENTER**

20. Has DEA registration of the facility ever been suspended or revoked? Yes \_\_\_\_ No \_\_\_\_  
 a. If yes, provide details \_\_\_\_\_ (please attach documentation)
21. Has the Designated Representative/Person in Charge ever been convicted of a crime relating to distribution of prescription drugs or any other crime? Yes \_\_\_\_ No \_\_\_\_  
 a. If yes, provide details \_\_\_\_\_ (please attach documentation)
22. Have there been any disciplinary actions taken against facility by any state? Yes \_\_\_\_ No \_\_\_\_  
 a. If yes, provide details \_\_\_\_\_ (please attach documentation)
23. Is wholesaler VAWD certified? Yes \_\_\_\_ No \_\_\_\_ (please attach copy of certification)

### **IV. BUSINESS INFORMATION**

24. Please provide a general description of the business or the facility. \_\_\_\_\_

25. Customer categories which the facility(s) may supply:

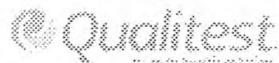
Hospitals	Yes ____ No ____ # of accounts _____
Retail Chain Pharmacy	Yes ____ No ____ # of accounts _____
Retail Independent Pharmacies	Yes ____ No ____ # of accounts _____
Closed Door (Long Term Care) Pharmacies	Yes ____ No ____ # of accounts _____
Mail Order Pharmacies	Yes ____ No ____ # of accounts _____
Physician Offices	Yes ____ No ____ # of accounts _____
Wholesalers	Yes ____ No ____ # of accounts _____
Retail Chain Distribution Centers	Yes ____ No ____ # of accounts _____
Government- DOD/VA	Yes ____ No ____ # of accounts _____
Pain Clinics and Bariatric Clinics	Yes ____ No ____ # of accounts _____
Veterinary Clinics/Wholesaler	Yes ____ No ____ # of accounts _____

26. Please list all suppliers of controlled substances \_\_\_\_\_
- \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

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Qualitest  
110 W. Main St., Suite 100  
Maryville, TN 37801  
(865) 584-4417

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**V. SOM AND ANTI-DIVERSION PROGRAM**

27. Company has a Suspicious Order Monitoring Program which complies with 21CFR 1301.74(b) for controlled substances? Yes    No
28. Company has a Suspicious Order Monitoring Program which complies with 21 U.S.C. 830(b) for listed chemicals? Yes    No    N/A
29. Company complies with the controlled substances and chemical laws of every state in which it is distributing controlled substances and/or listed chemicals? Yes    No
30. Please provide a copy of your Suspicious Order Monitoring Program SOP or Summary of Program.
31. Please provide contact information for SOM department point of contact.
- Name: \_\_\_\_\_
  - Phone: \_\_\_\_\_
  - Email: \_\_\_\_\_
32. Please provide contact information for the point of contact regarding held orders needing additional information
- Name: \_\_\_\_\_
  - Phone: \_\_\_\_\_
  - Email: \_\_\_\_\_

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Printed Name

\_\_\_\_\_  
Date